

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

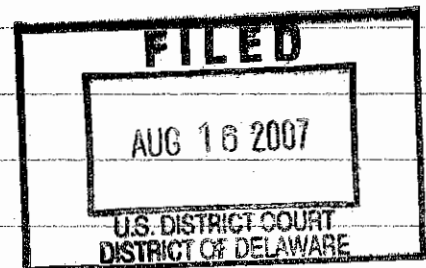
KEVIN C. BRATHWAITE
PLAINTIFF

V.

CA. # 007-006 G.M.S

JURY TRIAL DEMANDED

CORRECTIONAL MEDICAL
SERVICES, SCOTT ALTMAN,
AND CATHY KIGNKE



PLAINTIFF'S ANSWERS TO
INTERROGATORIES

Attached are the prepared questions
that the defendants sent to
the plaintiff.

9. Unless otherwise stated or clearly implied from a particular Discovery Request, the relevant time frame for these Discovery Requests is from January 1, 2003 through (and including) the time when the answers to these Discovery Requests or any supplement thereto is served.

INTERROGATORIES

1. State your full name, social security number, and all addresses at which you lived in the ten years prior to your current incarceration.

ANSWER: Kevin C. Brathwaite
Boston MA.
Wilmington DE.

2. Identify all the health care providers, including name, address and telephone number, who treated you for any reason in the ten years prior to your current incarceration. For each health care provider identified, identify the treatment provided, the dates of such treatment and the reason for treatment.

ANSWER: Suffolk County Sheriff's Dept.
Boston MA.
1-Filling - 1994

3. Identify all your employers (including name, address and telephone number) in the ten years prior to your current incarceration. For each such employer identified, state the position you held with each, the job duties you performed, the start and end dates of your employment with each and the rate of pay you earned with each.

ANSWER: Self Employed

4. Do you contend that any defendant in this case is liable to you for medical negligence? If so, state each and every fact upon which such claim is predicated, including, but not limited to: the applicable standard of care, the specific manner in which it was breached, by whom it was breached, the manner in which such alleged breach proximately caused injury, the specific injury attributable to each breach, and the precise dates of same.

ANSWER: *see Complaint*

5. Identify with specificity every "serious medical need" to which you allege any defendant was "deliberately indifferent", and the precise dates of such alleged "deliberate indifference".

ANSWER: *See Complaint*

6. State whether you are married. If so, identify your spouse and any children you have with her, as well as any previous spouses and children of those marriages.

ANSWER: *Not Relevant*

7. Are you willing to execute an authorization to allow CMS to obtain records of your prior medical treatment? If so, execute the document included herewith and return the original to the undersigned.

ANSWER: *Yes - no document included for PLAINTIFF to sign*

8. Provide the dates of your incarceration and of your expected release.

ANSWER:

1998 - never

BALICK & BALICK, LLC

/s/ James E. Drnec

James E. Drnec, Esquire (#3789)

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Wilmington, Delaware 19801

302.658.4265

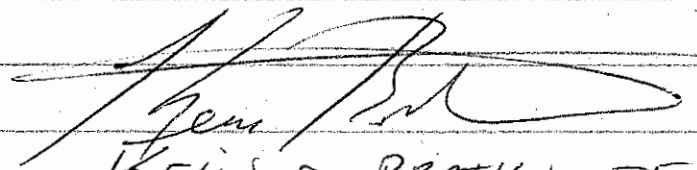
Attorneys for Defendant CMS

Date: July 31, 2007

Certificate of Service

I KEVIN C. BRATHWAITE, states that I have caused a copy of the attached documents to be mailed to the following party by way of U.S. Postal Service.

JAMES E. DRNEC, ESQ
711 King St.
Wilmington DE.
19801


KEVIN C. BRATHWAITE
1181 Paddock Rd.
SMYRNA DE.
19977

DATED: August, 14th, 2007